

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE:

Case No. 1-21-40301 (ESS)

QB WASH, LLC,  
*dba* Blvd Auto Spa

Chapter 7

Debtor.

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**OBJECTION AND STATEMENT IN RESPONSE TO MOTION OF 138-77  
QUEENS BOULEVARD LLC FOR AN ORDER PURSUANT TO RULE 2004 OF  
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE DIRECTING THE  
PRODUCTION OF DOCUMENTS BY AN ORAL EXAMINATION OF THE  
DEBTOR'S PRINCIPAL AND CERTAIN RELATED PARTIES AND THE  
PRODUCTION OF DOCUMENTS BY THE DEBTOR**

**TO: THE HONORABLE ELIZABETH S. STONG,  
UNITED STATES BANKRUPTCY JUDGE**

QB Wash, LLC (the "Debtor"), through their attorneys Law Offices of Gregory Messer, hereby impose their objection to the motion 138-77 Queens Boulevard LLC (the "Landlord") for an order directing the oral examination and production of documents from the Debtor in connection with the Debtor's bankruptcy case, respectfully represents as follows:

1. The Debtor filed a petition under Chapter 7 of the Bankruptcy Code on February 8, 2021 and David Doyaga, Sr. was appointed the Chapter 7 Trustee.

2. The Trustee through his counsel has requested substantial documents from the Debtor all of which have been turned over in an orderly and timely manner. The Debtor has been cooperative and responsive. He has answered all of the Trustee's questions and has sat for all examinations and turned over all documents that have been requested.

3. The Debtor has attempted to take the place of the Chapter 7 Trustee of the causes of action he is trying to establish would belong to the Debtor's estate. The Trustee is a very experienced professional and has employed experienced and confident counsel. If the Landlord believes that there is information that the Trustee should see he should bring it to the attention of the Trustee who would then request the information.

4. The Trustee is more than capable of conducting the necessary discovery and to the extent that the Debtor has in his possession documents and information, they will cooperate with the Trustee. This effort by the Landlord is duplicative of the role of the Trustee and is essentially a form of harassment.

WHEREFORE, it is respectfully request that Court should not permit the landlord to conduct an investigation which the Trustee should conduct and will continue to conduct.

Dated: Brooklyn, New York  
July 6, 20221

Respectfully submitted,

*/s/ Gregory Messer*

By: \_\_\_\_\_

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